



VIRGINIA
& AMBINDER LLP
A t t o r n e y s a t L a w

40 Broad Street, 7th Floor
New York, New York 10004
Telephone: 212.943.9080
www.vandalllp.com

Paige I. Piazza, Esq.
Associate
ppiazza@vandalllp.com

October 30, 2025

VIA ECF

Judge Joseph A. Marutollo, U.S.M.J.
United States District Court,
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: *Laduca et al v. Bari Home Care, LLC et al*, Docket No. 24-cv-07970 (LDH)(JAM)

Dear Judge Marutollo,

This firm is counsel to Plaintiffs in the above-referenced action. Together with defense counsel, we submit this joint status report pursuant to this Court's September 17, 2025 Order.

In accordance with the September 17, 2025 Status Report Order, the parties have been engaged in pre-class certification discovery. To that end, Defendants intend to produce responses to Plaintiffs discovery demands on or before November 7, 2025. Accordingly, the parties respectfully request an extension of time to complete pre-class certification discovery to January 8, 2026. The extension would allow Plaintiffs time to review Defendants' responses, determine whether there are any deficiencies, and contemplate the need for any pre-class certification depositions. Thereafter, Plaintiffs anticipate seeking a conference with the Court and/or the Court's permission to file a motion for class certification.

We thank the Court for its attention to this matter.

Respectfully submitted,

/s/ Paige I. Piazza, Esq.

Cc: All counsel of record (via ECF)